IN THE UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF PENNSYLVANIA

JESSICA RAMSAY, :

Plaintiff

v. : CIVIL ACTION NO. 19-2002

:

NATIONAL BOARD OF MEDICAL

EXAMINERS,

Defendant :

PLAINTIFF'S UNOPPOSED MOTION TO EXTEND TIME FOR FILING REPLY BRIEF IN SUPPORT OF MOTION FOR PRELIMINARY INJUNCTION

Plaintiff Jessica Ramsay respectfully moves this Honorable Court to extend the time for filing her Reply Brief in support of her Motion for Preliminary Injunction (Document No. 7) from September 13, 2019, the date set in this Court's August 8, 2019 Order (Document No. 16) until September 19, 2019. Plaintiff's undersigned counsel does not believe that this brief extension will delay any other proceeding in this case, including the Injunction Hearing which has been previously set for December 3, 2019. Plaintiff's counsel has consulted with counsel for defendant, Mr. Burgoyne, and defendant does not object to this request.

In support of this motion, plaintiff respectfully represents as follows:

- 1. Since the time that the briefing schedule was set, one of plaintiff's undersigned attorneys (Lawrence Berger) has suffered a hand injury which requires medical attention, and another of plaintiff's attorneys (Mary Vargas) is now scheduled for court appearances in Massachusetts during the week of September 9 to 13.
- 2. Because of the hand injury, Mr. Berger is scheduled for a therapy appointment on September 12, and a doctor's appointment on September 13.
- 3. Other preparation for the Injunction Hearing will not be affected by this brief requested postponement.

WHEREFORE, plaintiff respectfully requests that this Honorable Court enter an Order extending the time for plaintiff to file her Reply Brief in support of her Motion for Preliminary Injunction to September 19, 2019.

Respectfully submitted,

Lawrence D. Berger

Lawrence D. Berger (ID No. 16028)

Larry@rcglawoffices.com

REISMAN CAROLLA GRAN & ZUBA LLP

19 Chestnut Street

Haddonfield, NJ 08033

(856) 354-0021

Mary C. Vargas (ID No. 324005)

Stein & Vargas llp

10 G Street NE, Suite 600

Washington, DC 20002

(202) 248-5092

Attorneys for Plaintiff Jessica Ramsay

Dated: September 6, 2019

Certificate of Service

I hereby certify that a copy of Plaintiff's Unopposed Motion To Extend Time For Filing Reply Brief In Support Of Motion For Preliminary Injunction, and proposed Order, were electronically filed on September 6, 2019, via the Court's CM/ECF System, which will send notification of such filing to counsel of record for defendant and I have also sent a copy by email to the following on the date below:

Nancy L. Goldstein, Esquire Hamburg & Golden, P.C. 1601 Market Street, Suite 3310 Philadelphia, PA 19103-1443 Robert A. Burgoyne, Esquire Perkins Coie LLP 700 Thirteenth Street, N.W. Suite 600 Washington, D.C. 20005-3960

goldsteinnl@hamburg-golden.com

RBurgoyne@perkinscoie.com

Attorneys for Defendant

Lawrence D. Berger

Attorney for Plaintiff Jessica Ramsay

September 6, 2019